

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**IN RE:**

**PDG Prestige, Inc.,**

*Debtor*

§  
§  
§  
§

**CASE NO. 21-30107-hcm  
(Chapter 11)**

**WITNESS AND EXHIBIT LIST OF DEBTORS FOR  
HEARING SCHEDULED FOR APRIL 12, 2021**

TO THE HONORABLE H. CHRISTOPHER MOTT, U. S. BANKRUPTCY JUDGE:

COMES NOW City Bank, a secured creditor and a party in interest in this case, and files this Witness & Exhibit List For Hearing Scheduled for April 12, 2021.

**WITNESSES**

City Bank discloses that it may call the following individuals to provide testimony:

1. Morris Wilcox, Senior Vice President – Special Assets Manager, City Bank.

City Bank reserves the right to supplement or amend this Witness List and to call other witnesses as may be necessary for rebuttal or impeachment purposes. City Bank also reserves the right to call any witnesses designated or called by any other party to these proceedings.

**EXHIBITS**

City Bank discloses that it may introduce the following exhibits:

<b>TAB</b>	<b>DESCRIPTION</b>
1.	Promissory Note dated July 13, 2018 in the original sum of \$2,600,000.00
2.	Deed of Trust dated July 13, 2018
3.	Modification of Mortgage dated April 13, 2020

City Bank reserves the right to supplement or amend this Exhibit List in order to supplement the list of documents that may be introduced. City Bank also reserves the right to introduce other exhibits as may be necessary for impeachment purposes. City Bank also reserves the right to introduce exhibits designated by any other party to these proceedings.

Respectfully Submitted,

By: /s/ Brad W. Odell

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*Attorneys for City Bank*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 12<sup>th</sup> day of April, 2021, a copy of City Bank's Witness & Exhibit List was served upon the following parties listed below by the Court's ECF notification system and/or U.S. Mail:

1. PDG Prestige, Inc.  
780 N. Resler Drive, Suite B  
El Paso, TX 79912  
***Debtor***
2. Jeff Carruth  
WEYCER KAPLAN PULASKI & ZUBER, P.C.  
3030 Matlock Rd., Ste 201  
Arlington, TX 76015  
***Attorney for Debtor***
3. United States Trustee  
P.O. Box 1539  
San Antonio, TX 78295  
***U.S. Trustee***

4. City Bank  
Attn: Morris Wilcox  
5219 City Bank Parkway  
Lubbock, Texas 79407  
***Creditor***
5. To all other parties requesting  
ECF notification.

/s/ Brad W. Odell

Brad W. Odell